

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:23-CV-24299-MORENO/TORRES

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

vs.

AMOR DE JESUS, CORP.,
SWEET LIVING FACILITY INC.,
JOSE MACHADO,
ZELMIRA QUINONEZ, and
AMINTA QUINONEZ,

Defendants.

_____ /

DECLARATION OF MARIA ELENA CHAVEZ LETONA
PURSUANT TO FLA. STAT. §95.525

I, Maria Elena Chavez Letona, make the following declaration pursuant to Fla. Stat. § 95.525, and under penalty of perjury, state as follows:

1. My name is Maria Elena Chavez Letona.
2. I am over the age of 18 and *sui juris*.
3. I make this Declaration based on my personal knowledge.
4. I worked at Sweet Living Facility Inc. (“SLF”)’s assisted living facility located at 15505 S.W. 16th Lane, Miami, Florida 33185 from 2020 through August 2022.
5. I worked at Amor De Jesus, Corp. (“ADJ”)’s assisted living facility located at 14283 S.W. 177th Street, Miami, Florida 33177 from 2020 through August 2023.
6. While working for ADJ, Defendant Jose Machado (“Mr. Machado”) served as its president.

7. During the time I worked for SLF and ADJ between 2020 and 2023, Mr. Machado was the husband of ADJ's manager and administrator, Defendant Aminta Quiñonez.

8. I would answer the phone while working at ADJ, and people would routinely call and ask me to speak with Mr. Machado. I would also retrieve mail that was addressed to him at the address of ADJ's assisted living facility.

9. Mr. Machado would routinely receive mail and telephone calls at ADJ's assisted living facility from individuals doing business with ADJ during my employment.

10. Mr. Machado's certificates and/or diplomas were posted on a wall at ADJ during my employment.

11. I saw Mr. Machado involved in the day-to-day business operations of ADJ during my employment by regularly and routinely engaging in activities such as:

- a. Delivering groceries and supplies to me that he bought for residents of the assisted living facility, which I was required to organize and put away;
- b. Delivering cash to Aminta Quiñonez, who would use the cash to pay my wages;
- c. Observing me while I worked; and
- d. Overseeing and paying for repairs at the facility, such as for the air conditioning unit.

12. Mr. Machado would direct me in performing my job duties for ADJ by instructing me:

- a. To set the assisted living facility's air conditioning unit to specific temperatures;
- b. How to turn on and operate a generator if there was ever a power outage at the assisted living facility;
- c. How to fix clogged toilets and septic backups in the assisted living facility; and

d. To notify him if there was ever a problem with the assisted living facility's air conditioning unit, electrical connection, septic system, or if there were any other repairs which needed to be made.

13. On some weeks during my employment at ADJ, Mr. Machado would directly hand me an envelope containing cash to pay me for the work that I performed at ADJ.

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

By my signature below, I execute this declaration in Miami-Dade County, Florida, and declare under penalty of perjury that the foregoing is true and correct.

By: 
Maria Elena Chavez Letona (Jun 27, 2024 16:08 EDT)
MARIA ELENA CHAVEZ LETONA

06/27/2024

DATE

INTERPRETER'S ACKNOWLEDGEMENT

On June 27, 2024, Hillary Frontado, who is personally known to me, affirmed that the foregoing was translated for MARIA ELENA CHAVEZ LETONA and that she fully understood the contents of the foregoing.

Hillary Frontado
Hillary Frontado (Jun 27, 2024 16:05 EDT)

Interpreter's Signature




Notary Public / State of Florida